

In light of the privacy interests at stake, ECF No. 39 is to remain under seal, viewable only by the parties and court personnel.



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

SO ORDERED

/s/ Alvin K. Hellerstein
U.S.D.J.

April 22, 2024

Marina Moraru
Special Assistant Corporation Counsel
Office: (212) 356-2456

April 17, 2024

VIA ECF

Hon. Alvin K. Hellerstein
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *J.H. v. New York City Dep't of Educ.*, 23-cv-4753 (AKH)(BCM)

Dear Judge Hellerstein:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on administrative hearings under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request that the Declaration of Emily Goldman in opposition to Plaintiff's motion for fees (ECF 39) be sealed, and that Defendant be allowed to submit a corrected Declaration. The document filed inadvertently included the parent's name and incorrectly identified them as the Principal of iHope. I have already contacted the Court's ECF Error email account asking that ECF 39 be temporarily sealed pending a request to the Court.

Thank you for considering this request.

Respectfully submitted,

/s/ Marina Moraru

Marina Moraru, Esq.
Special Assistant Corporation Counsel

cc: Irina Roller (via ECF)